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MEMO ENDORSED

April 3, 2008

VIA OVERNIGHT MAIL

Honorable Kenneth M. Karas
United States District Court
United States District Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

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RE: Pape et. al. v. Wappingers Central School District, et. al. (Case No. 07cv8828)

Dear Judge Karas:

Per your instructions, I am respectfully requesting a pre-motion conference with regard to the above-referenced matter. It is my intention to make a motion to dismiss Plaintiffs' Amended Complaint on the following grounds:

- Plaintiffs William and Nancy E. Pape lack standing to bring suit;
- Claims against Defendants Wayne Gersen and Joseph Corrigan, in their individual and official capacities must be dismissed;
- all of Plaintiffs' claims under 42 U.S.C. § 1983 must be dismissed (both for alleged violations of federal statutes and the Constitution);
- Plaintiffs' claims for compensatory and punitive damages must be dismissed;
- Plaintiffs' claims are time barred and barred under the doctrine of laches;
- and Plaintiffs failed to serve a notice of claim upon the Defendants.

Additionally, I respectfully request leave to present motion papers exceeding the 25 page length limit. It is my sincere hope to present papers within the 25 page limit but I may require additional pages given the number of grounds for the motion.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

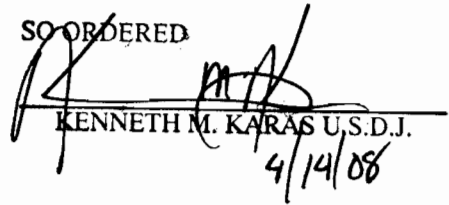


Neelanjana Choudhury (2342)

cc: Ben M. Arai, Esq. (via overnight mail)

The Court will hold a pre-motion
conference on May 22, 2008, at 10:45
Plaintiffs are to respond to this letter
by April 16, 2008.

SO ORDERED


KENNETH M. KARAS U.S.D.J.
4/14/08